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April 24, 2024

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Sajid Javed
Docket No.: 16-CR-601 (VSB)

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 04/29/2024

Dear Judge Broderick:

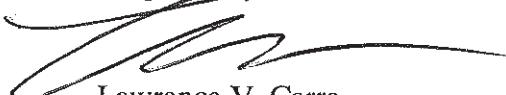
Defense counsel and the Government respectfully submits this joint letter seeking a 45-day adjournment of the deadline by which to submit a proposed discovery schedule, in light of the parties' ongoing negotiations about a potential settlement of this ancillary forfeiture proceeding.

As the Court is aware, this matter now encompasses two properties to which the defendant, Sajid Javed, may possess a forfeitable interest in. Over the course of the past several months, the parties have engaged in meaningful conversation in an effort to obtain an amicable resolution of this matter.

Over the course of the past several weeks, the parties have reviewed a significant amount of documents in an effort to arrive at an amicable resolution of both properties. The parties have now entered into specifics as to a settlement considering both the amount, if any, to be paid, and the time frame in which said amount should be paid.

By reason of the foregoing, the parties jointly and respectfully request a 45-day adjournment of the deadline by which to submit a proposed discovery schedule to give the parties additional time to continue their efforts to resolve this ancillary forfeiture proceeding without further litigation.

Respectfully Submitted,


Lawrence V. Carra

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